

EXHIBIT 78

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
11)

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Wednesday, January 9, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of GEORGE
CHAPMAN, held at 4206 South J.B. Hunt Drive,
Rogers, Arkansas, commencing at 9:00 a.m., on
the above date, before Debra A. Dibble,
Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

GOLKOW LITIGATION SERVICES
877.370.3377 ph | fax 917.591.5672
deps@golkow.com

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[REDACTED]

Page 88

[REDACTED]

Page 87

[REDACTED]

Page 89

[REDACTED]

Page 90

[REDACTED]

Page 92

[REDACTED]

Page 91

[REDACTED]

Page 93

[REDACTED]

Page 94

[REDACTED]

20 Q. (BY MR. INNES) And when did
21 that understanding change to your current
22 understanding?

23 A. I can't remember an exact date,
24 but it would be after conversations began
25 around the opioid crisis.

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1 Q. When did the opioid crisis
2 begin?

3 MR. VARNADO: Object to the
4 form.

5 THE WITNESS: I first became
6 aware of when everyone was using the
7 term around -- "opioid crisis" --
8 probably 2014, 2015.

9 Q. (BY MR. INNES) So is that
10 around the time your understanding changed?

11 A. My understanding of?

12 Q. Diversion.

13 A. I'm sorry?

14 Q. Diversion.

15 A. Yes.

16 Q. End of 2014, beginning of 2015,
17 you came to a different understanding of
18 diversion? Your current understanding of
19 diversion?

20 A. That a suspicious order could
21 be considered as diversion.

[REDACTED]

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[REDACTED]

Page 97

[REDACTED]

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[REDACTED]

Page 99

[REDACTED]

25 MR. INNES: For the record, now

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1 I'm getting glare off the computer
2 screen, so we're all on an even
3 playing field.
4 MR. VARNADO: All in it
5 together now.
6 MR. INNES: I just want the
7 record to be clear now.
8 THE WITNESS: The sun is
9 terrible.
10 (Discussion off the record.)
11 THE VIDEOGRAPHER: Let's go off
12 the record for one second, if that's
13 okay.
14 MR. INNES: Sure.
15 THE VIDEOGRAPHER: 11:08. We
16 are off video record.
17 (Recess taken, 11:08 a.m. to
18 11:17 a.m.)
19 THE VIDEOGRAPHER: 11:17. We
20 are on the video record.
21 Q. (BY MR. INNES) Mr. Chapman,
22 let me continue on this same vein for a
23 little while.

[REDACTED]

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[REDACTED]

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[REDACTED]

Page 192

[REDACTED]

Page 191

[REDACTED]

Page 193

[REDACTED]

Page 194

[REDACTED]

Page 196

[REDACTED]

Page 195

[REDACTED]

Page 197

[REDACTED]

[illegible]

Response	Percentage
Yes, the U.S. should take action	95%
No, the U.S. should not take action	5%

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Row	Bar Length (approx. % of total width)
1	85
2	88
3	92
4	95
5	85
6	95
7	95
8	55
9	88
10	98
11	10
12	92
13	95
14	90
15	95

Category	Percentage
U.S. should take more action	85%
U.S.-born	85%
U.S. should take less action	15%
U.S.-born	15%

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]